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JUL 27 2001

Technology Center 2100

REMARKS

Claims 1-4, 6, 7, 10, 12-14, 18-21, 23-25, 27-29, 31-34, 36, 39, and 41-81 are pending in the present application. The Examiner has raised an objection to the specification asserting that the specification fails to provide proper antecedent basis for the claimed subject matter. The Examiner has objected to claims 70-73, 75 and 76 pursuant to 37 CFR 1.75(c). The Examiner has rejected claims 1-4, 6, 7, 10, 12-14, 18, 21, 23-25, 27-29, 31, 66, 67, and 70-81 pursuant to 35 U.S.C. §112. The Examiner has rejected 1-4, 6, 7, 10, 12-14, 18-21, 23, 27, 3-34, 36, 39, and 41 - 56, 58 -60, 68-80, pursuant to 35 U.S.C. § 102 and 35 U.S.C. § 103(a). Applicant has canceled claim 2 and amended claims 1, 3, 10, 18, 23, 27, 32, 41-43, 49, 53, 56-58, 63, 67, 69, 72-76, and 79-80. Applicant respectfully requests reconsideration of pending claims 1, 3-4, 6, 7, 10, 12-14, 18-21, 23-25, 27-29, 31-34, 36, 39, and 41-81 in view of the following amendments and remarks.

I. Objections to the Specification:

The Examiner objected to the specification stating:

The specification is objected to as failing to provide proper antecedent basis for the claimed subject matter. See 37 CFR 1.75(d)(1) and MPEP §608.01(o). Correction of the following is required. The specification does not support the claimed subject matter claimed in claims 74-81, i.e. "computer readable program code" configured to "submit said at least one payment to said server system software", "credit postage value corresponding to an amount of said at least one payment to a user account" or "deduct said amount from said user account" as being done by "client system software".

Applicant has amended claims 74-81 to address the Examiner's concerns with respect to antecedent basis. Applicant respectfully submits that the specification provides proper antecedent basis for claims 74-81 as amended.

II. Objections Under 37 C.F.R. 1.75(c)

The Examiner has objected to claims 70 - 73, 75 and 76 pursuant to 37 C.F.R. 1.75(c). The Examiner states:

Claims 70-73, 75 and 76 are objected to under 37 CFR 1.75(c), as being of improper dependent form for failing to further limit the subject matter of a previous claim. Applicant is required to cancel the claim(s), or amend the claim(s) to place the claims in proper dependent form, or rewrite the claim(s) in independent form.

In lines 8-9 of the independent claim 69, it recites that "adding postage value corresponding to an amount of said at least one payment to a user account". However dependent claims recite various payment options (i.e. "deducting said amount from said user account" (Claim 70, line 2); "said deducting is performed upon authorization from said user account" Claim 71, lines 1-2), "said payment comprises credit card data" (Claim 72, line 1); "said payment comprises electronic funds transfer data" (Claim 73, lines 1-2)) which cannot be used with that payment method claimed in the independent claim 69 (i.e. "adding postage value corresponding to an amount of said at least one payment to a user account"). For the same reasons, claims 75 and 76 are objected.

Applicant respectfully disagrees and submits that claims 70-73, 75 and 76 are in proper form as they further limit the subject matter set forth in the corresponding independent claims.

Dependent claims 70 - 73 properly limit the subject matter of the previous claim. Independent claim 69 describes a method where the client system software presents one or more options for submitting at least one payment to the

server system. Dependent claims 70 -73 properly limit the independent claims by including a process for deducting the amount of postage credited from the user's account (i.e. claim 70), the deduction may be performed upon authorization from the user (i.e. claim 71), and may comprise credit card data (i.e. claim 72) and/or electronic funds data (i.e. claim 73). Each dependent claim further limits one or more elements of the independent claim.

Dependent claims 75 and 76 also properly limit the subject matter of the corresponding independent claim. Independent claim 74 describes a method where client system software is configured to present one or more options for submitting at least one payment. Dependent claims 75 and 76 properly limit independent claim 74 by further describing that the amount may be deducted from the user account (i.e. claim 75) and that the payment may be submitted upon authorization from the user (i.e. claim 76). Independent claim 74 does not contain either of these limitations and therefore Applicant respectfully disagrees with the Examiner's position that Dependent claims 75 and 76 do not further limit claim 74.

Claim Informalities:

The Examiner has objected to claims 19, 20, and 33 for informalities. The Examiner states:

Claims 19, 20, and 33 are objected to because of the following informalities: (1) Claim 19, line 2, after "print", "cancel" has been deleted without using a bracket, (2) claim 20, line 2, "comprise" should be --comprises--, (3) claim 33, line 1, "onlin" should be --on-line--.

Applicant thanks the Examiner for pointing out these informalities and has amended claims 19, 20, and 33 to address the Examiner's concerns.

III. Rejections Under 35 U.S.C. §112

The Examiner has rejected claims 1-4, 6, 7, 10, 12-14, 18-21, 23-25, 27-29, 31, 66, 67, and 70-81 under 35 U.S.C. §112 as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. The Examiner states:

Claim 1, line 9 the, " a request" cannot be clearly understood. It is not clear what kind of "request" it is, e.g. "request" for an account balance, price check, or what. Likewise, "request" in claim 10 cannot be clearly understood.

Claim 18, line 2, "the print spooler" does not have proper antecedent basis.

Claim 23, line 3, "a permission" cannot be clearly understood it is, e.g. "permission" to use software, to play video game, or what. Likewise, "permission" in claim 27 cannot be clearly understood.

Claim 66 cannot be clearly understood. It is not clear whether "user" is referring to a person or a system of a user. "

Claim 67 cannot be clearly understood. It is not clear whether "said client system" and "at least one client system" are same system or not.

Claim 70-73, it is not clear which payment method is used. For example in claim 70, is the payment method by "adding postage value corresponding to an amount of said at least one payment to a user account", by "deducting said amount from said user account" or using both.

Claim 74, it is not clear what the differences are between "computer readable program code" and "client system software" More specifically, are "computer readable program code" and "client system software" separate programs or the one is the part of the other. If these are two separate program, the specification does not provide proper antecedent basis for the claimed subject matter.

Claim 76, line 1, "said deducting" does not have proper antecedent basis.

Applicant has amended claims 1, 18, 23, 67, 72-74, and 76. Applicant respectfully submits that claims 1, 18, 23, 66-67, 70-73, 74, and 76 as amended distinctly claim the subject matter Applicant regards as the invention.

With respect to claim 66 Applicant submits that the term "user" is not in claim 66. Applicant therefore requests that the Examiner point out with more particularity where the term user cannot clearly be understood. Applicant submits that the term user used throughout the claims could mean person or system and that accordingly the term is sufficiently clear to enable one of ordinary skill in the art to practice the invention.

With respect to the Examiner comments about claims 70-73 Applicant respectfully submits that the claim 70 is sufficiently clear in view of corresponding independent claim 69. Independent claim 69 describes a system that allows for "adding postage value corresponding to an amount of said at least one payment to a user account." Thus, a user's account may be credited a certain postage value that corresponds to an amount. Dependent claim 70 further describes that the amount may be deducted from the user account. Applicant respectfully submits that claims 69 and 70 when viewed in combination are sufficiently clear to distinctly claim what Applicant regards as the invention. Claim 71 further describes that the deducting set forth in claim 70 may be performed upon authorization from the user. Applicant respectfully submits that claims 70-71 are sufficiently clear in the present form.

IV. Rejections Under 35 U.S.C. §102

A. Independent claims 42, 69 and 74

The Examiner has rejected claims 42, 43, 56, 68, 69-79, and 81 under 35 U.S.C. § 102 as being anticipated by Kara (US PAT. 5,822,739). The Examiner states:

As per independent claim 42, 69, and 74, and dependent claims 43, 56, 70-73, 75-79, and 81 Kara discloses a secure on-line postage method comprising: establishing a secure continuous communication link between a client system and a server system whereby the system processes the user's request. (col. 6, lines 11-22, 37-43). It also discloses that authentication of a user with the establishment of a secured communication link and verifying the authenticity of the information exchanged. (col. 6, lines 11-22). Kara also discloses a method of submitting payment, adding postage value, deducting amounts from user accounts with authorization from the user. (col. 13, lines 25-30 and 31-45). Kara also discloses a computer program having a computer readable medium having computer readable program code and configured to establish a continuous link between the client system and the server system whereby client system may submit payment to the server system while a continuous link persists. (col 6, lines 11-17; col. 13, lines 25-30 and 31-45).

Applicant respectfully disagrees and submits that independent claims 42, 69, and 74 as amended are allowable for at least the following reasons.

The system described in Kara is physically interconnected by a network, but the network described in Kara does not maintain a secure continuous link between a client system and a server system. The printing task in Kara does not depend upon the state of the secure continuous communication link.

Kara describes a system for remote postage metering that utilizes a "Demand Program" to request and receive postage. The Examiner states that Kara describes a system where a continuous link between the first computer and the second computer is maintained. The Examiner cites col. 6, lines 11-22 and

lines 39-43 of Kara as support for the proposition that the prior art describes a postal system where a link is continually maintained between two computers during authorization and performance of a printing task. Applicant respectfully disagrees and submits that the communication link in Kara is not continuously established and secure during authorization and printing.

The portions of Kara cited by the Examiner make reference to the "Demand program". The "Demand program" does not maintain a secure continuous link and secure communication link between a client system and a server system. Applicant refers the Examiner to Figure 2 of the Kara patent which illustrate some of the differences between the Kara reference and the claimed invention. Figure 2 of the Kara patent shows a flow diagram of the functionality associated with the "Demand program" (See e.g., col. 7, lines 48-49). The description in Kara associated with Figure 2 states "at step 202 the demand program determines if the accepted password is valid". After authorization occurs the demand program accepts postal information (See, e.g., step 203,-209), uses the collected information to assemble a demand for the remote metering device. Once the demand is assembled, the demand program establishes a link between the client computer and the server computer (see e.g., step 211) and transmits a demand for postage. After the receipt of the data the link between the client computer and demand computer is terminated. The Demand program then allows the postage indicia to be printed on an attached printer of the client computer.

Applicant respectfully submits that this link described in Kara is not continuously secure throughout authorization and printing. Instead Kara terminates the link to the centralized meter before the postal indicia is printed. The notion that Kara terminates its link between the client computer and the server computer is also shown in Figure 3 of the Kara patent. Referring to Figure 3, Kara states that at step 302 a link is established (See e.g., col. 12, lines 51-53) and at step 309 the link is terminated with the demand site (See e.g., col. 15, lines 3-6). None of the intervening steps (e.g., step 303-308) involve printing. Furthermore, Kara states that "it is advantageous to utilize as temporally short of communications link as possible in situations where there is a time dependent charge involved for maintaining such links there is no limitation of the present invention to establish and terminate the communication line...where digital communications trunks or a digital network system are utilized for linking..." (see e.g. col 11, lines 3-9).

Thus Applicant respectfully submits that Kara does not teach a system that is secure and continuously connected during authorization and printing. The system in Kara is physically connected but does not utilize a single session to determine if a user is authorized to print and then allow the user to print a printing task during the same connection while the connection is continuously being authenticated. Printing in Kara is not dependent on the status of the secure continuous communication link. For instance, the fact that Kara does not require termination step 214 to occur at a particular point in time does not mean that the printing task occurs while the secure continuous communication link is

continuous. In Kara the printing task is not associated with the state of the communication link nor its security. For instance, in Kara the printing task occurs regardless of the secure state of the connection once the postal indicia information has been transmitted to the client computer. (See e.g. col 15, lines 1-4).

In contrast, the claimed invention describes a method and apparatus for printing that establishes a secure continuous communication link between a client system and a server system. The link between the client system and server system is continuously present during the user request for generating an indicia with the client system securely communicating the user request to the server system. The server system then processes the user request and securely communicates to the client system a response to the user request. The client system processes the response to generate an indicia and the client system generates an indicia while communicating between the server system and the client system while the link remains secure and continuous. The client system then generates the indicia on the user's printer while the link remains secure and continuous.

As Figures 2 and 3 illustrate, Kara does not describe a system where the printing task is performed while the communication link is continuous. Thus Applicant respectfully submits that Kara does not teach, suggest, or describe the claimed invention.

B. Dependent Claims 43, 56, 68, 70-73, 75-79, and 81

Applicant respectfully submits that claims 43, 56, 68, 70-73, 75-79, and 81 being dependent upon respective allowable base claims are allowable for at least the foregoing reasons stated above.

V. Rejections Under 35 U.S.C. §103

A. Independent Claim 1 and 32

The Examiner has rejected claims 1-4, 6, 7, 10, 12, 13, 14, 18-21, 23, 27, 32-34, 36, 39, 41, 44-55, 58, 59, 60, and 80 under 35 U.S.C. §103 as being unpatentable over Kara (US Pat. 5,822,739) stating:

Kara discloses a secure on-line printing method, comprising: establishing a communication link between a first computer and a second computer (i.e. claim 27, the step of "coupling said first system to a second processor-based system"); executing a client software on said first computer, wherein said client software initiates a continuous communication link between said first computer and said second computer (col. 6, lines 11-17); sending a request from said client software to said second computer (i.e. claim 27, the step of "transmitting said demand from said first system to said second system"); and sending value-bearing information from said second computer to said first computer in response to said request (i.e. claim 27, the step of "transmitting said data packet from said second system to said first system"), while said communication link is continuous (col. 11, lines 13-18).

Further Kara discloses a secure on-line postage metering method comprising: establishing a communication link between a user computer and a vendor computer (i.e., claim 27, the step of "coupling said first system to a second processor-based system"); providing a printer connected to said user computer (printer 21); executing an on-line postage metering software on said user computer wherein said on-line postage metering software determines if said communication link between said first computer and said second computer is continuous (col. 6, lines 11-17); said on-line postage metering software (i.e. "Demand program") sending a request for a print authorization to said vendor computer (i.e., claim 27, the step of "transmitting said demand from said first system to said second system"); said vendor computer accessing a database to verify fund availability to cover said request (col. 13, lines 31-45); said vendor computer sending data elements for a postage indicium to said first computer as a response to said request (i.e., claim 27, the step of "transmitting said data packet from said second system to said first system"); and said on line metering software sending a postage indicium graphic associated with said data elements to said printer (i.e. "Demand program" decrypting the received data packet for printing).

In regards to claims 1,18 and 19, Kara does not explicitly disclose the step of terminating said client software when said communication link is not continuous, said value-bearing information comprising disabling the print Spooler of a printer connected to said first computer, or said client software sending a print cancel command to said printer when said communication link disconnects. However, the examiner takes official notice of both motive and modification necessary for these features. More specifically, these features are well known in the data processing art to transfer confidential data securely and the abrupt disconnection of a secure link signifies that there is a possibility of breaching of security transferring sensitive data. Thus, it would have been within the level of ordinary skill in the art to employ these well-known features for the system of Kara to prevent theft of confidential information (e.g., credit card or debit account number) or fraudulent use of postage.

In regards to claim 2, Kara discloses that said value-bearing information (i.e., "data packet ") is used for printing an image (i.e., "postage indicia").

In regards to claims 3 and 4, Kara discloses said request and said value-bearing item information comprising encrypted data (col. 6, lines 17-22).

In regards to claim 6, Kara discloses said value-bearing information comprising an image of a postal indicium (col. 6, lines 40-42).

In regards to claim 7, Kara discloses said request comprising a postage amount (col. 6, lines 4-7).

In regards to claim 10, Kara discloses that said sending said request is in response to a command from a user (col. 3, lines 16-19).

In regards to claims 12 and 13, Kara discloses said second computer comprising a database containing user information, wherein said user information comprises financial information associated with said user (col. 13, lines 31-45. *It is well known in the art to keep user's credit or debit account in a database.*

In regards to claim 14, Kara discloses said sending a request to said second computer further comprises accessing said user information to verify fund availability to cover said postage amount (col. 13, lines 31-45).

In regards to claims 20 and 21, Kara discloses said value-bearing information comprising ticket information and said request comprises a ticket price (col. 15, lines 27-32).

In regards to claims 23 and 27, Kara discloses that said second computer sends a permission to said first computer in response to said request, said second computer accessing a user's financial information to verify funds availability (col. 13, lines 31-45. *If proper funding is available, said second computer sends permission to said first computer to use the Meter program.*

In regards to claims 32, 36 and 41, Kara does not explicitly disclose the step of terminating said online postage metering software when said communication link is not continuous, said on-line postage metering software disabling a print spooler of said printer, and said online postage metering software sending a print cancel command to said printer if said communication link is interrupted. However, the examiner takes official notice of both motive and modification necessary for these features. More specifically, these features are well known in the data processing art to transfer confidential data securely and the abrupt disconnection of a secure link signifies that there is a possibility of breaching of security transferring sensitive data. Thus, it would have been within the level of ordinary skill in the art to employ these well known features for the system of Kara to prevent theft of confidential information (e.g., credit

card or debit account number) or fraudulent use of postage.

In regards to claims 33 and 34, Kara discloses said online postage metering software sending a request comprising encrypting said request and said vendor computer sending said response comprising encrypting said response (*col. 6, lines 17-22*).

In regards to claim 39, Kara discloses that said on-line postage metering software sending said request for said print authorization is in response to a command from a user (*col. 3, lines 16-19*)

In regards to claims 44, 45, 46, 47, 48, 49, 50, 51, 52, and 53, Kara states the use of various security processes (*col. 6, lines 11-22*) without explicit disclosure of the specifically claimed features. However, the examiner takes official notice of both motive and modification necessary for these features. More specifically, these features are well known in the E-commerce art to prevent theft of confidential information (e.g., credit card or debit account number) or fraud. Thus, it would have been within the level of ordinary skill in the art to employ above well-known features for the system of Kara to prevent theft of confidential information (e.g., credit card or debit account number) or fraud.

In regards to claim 54, Kara discloses that said server system processing said user request takes place in a public network (*"the Meter program"*) and a private network (*"the bank card company" of the user*) included within said server system.

In regards to claim 55, Kara discloses that said public network processes (*"preparing data packet by the "Meter program"*) user requests independently from a said private network (*col. 13, lines 49-50, "credit account maintained at the local site and transmitted with the indicia request"*) to protect the integrity of said server system.

In regards to claim 58, Kara does not explicitly disclose the step of disabling said client system from obtaining said indicium if said secure and continuous communication between client system and server system is discontinued. However, the examiner takes official notice of both motive and modification necessary for this feature. More specifically, these features are well known in the data processing art to transfer confidential data securely and the abrupt disconnection of a secure link signifies that there is a possibility of breaching of security transferring sensitive data. Thus, it would have been within the level of ordinary skill in the art to employ these well known features for the system of Kara to prevent theft of confidential information (e.g., credit card or debit account number) or fraudulent use of postage.

In regards to claim 59, Kara discloses that said private network processes user requests for making payments (*col. 13, lines 49-50, "credit account maintained at the local site and transmitted with the indicia request"*).

In regards to claim 60, Kara discloses that said private network processes user requests for making payments further comprises communicating with a financial management system for verification of availability of funds and fund transfer (*col. 13, lines 49-50 "credit account maintained at the local site and transmitted with the indicia request"*)

In regards to claim 80, Kara does not explicitly disclose that said client system software prohibits transmission if said continuous communication link fails authentication. However, the examiner takes official notice of both motive and modification necessary for this feature, More specifically, this feature is well known in the data processing art to transfer confidential data securely and the failure of

authentication signifies that there is a possibility of transferring sensitive data to a wrong place or security breach of the communication link and it would have been within the level of ordinary skill in the art to employ this well known feature for the system of Kara to prevent theft of confidential information (e.g., credit card or debit account number).

Applicant respectfully disagrees and submits that independent claims 1 and 32 are allowable for at least the following reasons.

Kara does not teach, suggest, or describe client system software or postage metering software that terminates when the communication link is not continuous.

Applicant agrees that Kara does not explicitly teach the step of terminating the client software when the communication link is not continuous. Applicant also agrees that Kara does not teach, suggest or describe the disabling of the print spooler of the attached printer of the first computer or the client software sending a print cancel command to the printer when the communication link disconnects.

However, Applicant disagrees with the Examiner's official notice that such features are well known in the data processing art and would have been within the level of ordinary skill in the art to employ these well-known features. As support for the contention that both the motive and modification necessary for these features is known in the art, the Examiner relies upon the Kara reference. The Examiner states that the terminating the client software when the continuous link is not continuous is "within the level of ordinary skill in the art to

employ these well known features for the system of Kara to prevent theft of confidential information...or fraudulent use of postage." Applicant respectfully disagrees with the Examiner's statement that such features are frequently used. Print jobs are not traditionally dependent upon the state of the communication link with a server. Once a print job is delivered to the print spooler that print job is handed to the printer for completion.

The Examiner broadly assumes that terminating client software when the link is not continuous and disabling of a print spooler with the disconnection of a secure link may be generally referred as a common practice of preventing theft of confidential information. Applicant respectfully submits that the termination of the client software absent a continuous link with the second computer and disabling of the print spooler when the link is not continuous, should not be generally categorized as a feature to transfer confidential data securely and that nothing in the Kara reference suggests the inclusion of such features. Termination of the client software and the disablement of the print spooler are not required to ensure security and Kara cannot therefore suggest that the use of such features "to prevent theft of confidential information." Applicant therefore respectfully request that the Examiner provide references to support the statement that all the claimed features are "well known in the data processing art."

Applicant disagrees that it would have been obvious to one skilled in the art to terminate the client software and disable the print spooler when the

communication link is not continuous. The Examiner points to col. 6, lines 17-22 of Kara to support the notion that Kara teaches the use of security by utilizing cryptographic key sets for encrypting postage demands. However, the portion cited does not describe a system that utilizes a continuous link to enhance the security of the system. For instance, Kara does not monitor a communication link and then selectively permit a printing mechanism to perform the printing task in response to a print authorization while the communication link is continuous.

The Examiner also states that "it would have been within the level of ordinary skill in the art to employ these well known features for the system of Kara to prevent theft of confidential information or fraudulent use of postage." Applicant respectfully disagrees with the Examiner's characterization of the claimed invention and submits that it would **not** have been within the level of ordinary skill in the art to utilize the technique implemented in the claimed invention. Applicant submits that the claimed invention performs a printing task while the communication link is continuous. Current systems do not provide for printing while a continuous link is present and nothing in Kara or the prior art suggests that it would be beneficial to cancel a print job when the continuous link fails.

The Applicant respectfully submits that the Examiner has utilized impermissible hindsight in drawing the conclusion that one of ordinary skill would have been motivated to modify the print spooler that is claimed. The

specification filed in support of the claimed invention discusses the benefits of printing during a continuous link at page 69, lines 20 - page 70, lines 8. The application states that "one possible source of fraud is the user printer 1203, which is responsible for placing the postage indicia on an envelope or a label or any other desired medium. It is possible to capture an indicium print file (that contains image formation for printing a postal indicia) and store it for later reuse by the user while the print image is in the print queue of the user's computer. To prevent such possibility, one embodiment of the invention disables the print spooler when such an act occurs and does not allow print jobs to line up in a print queue. Because print jobs cannot queue up and because printing must take place on-line, PSD vendor system 1210 can closely monitor actual printing carried out by the user system 1200."

Without a continuous link being present the server computer will not be able to provide such a feature. Neither Kara, nor any of the other prior art of the record suggest such a technique. Since none of the references (other than the specification filed in support of the claimed invention) discuss the benefits of modifying the print spooler in the manner that is claimed, Applicant respectfully submits that the Examiner has utilized impermissible hindsight in drawing the conclusion that disabling a print spooler during printing is obvious to one of ordinary skill in the art. Support for this aspect of the claimed invention could only have been gleaned from the specification. Applicant therefore requests that the Examiner provides references in support of the contention that it is within the level of ordinary skill to include a means of detecting when a print spooler

should be disabled and a means for detecting the cancellation of a print job due to a link failure.

B. Dependent Claims 2-4, 6, 7, 10, 12, 13, 14, 18-21, 23, 27, 32-33, 36, 39, 41, 44-55, 58-60 and 80

Applicant respectfully submits that claims 3-4, 6, 7, 10, 12, 13, 14, 18-21, 23, 27, 32-33, 36, 39, 41, 44-55, 58-60 and 80 being dependent upon respective allowable base claims are allowable for at least the aforementioned reasons.

C. Independent Claim 63

The Examiner has rejected claims 57 and 61-67 under 35 U.S.C. §103(a) as being obvious by Kara (US Pat. 5,822,739) in view of Information Based Indicia Program System Specification (IBIPSS hereinafter: October 9, 1996, The United States Postal Service) stating:

Kara discloses an on-line postage system for processing of user request comprising: a client system (a first processor-bases system) for interfacing a user. A server system (a *second processor based system*) in continuous and secure communication with said client system, comprising (col. 6, lines 11-22): a communication server for communicating with client system (col. 7, lines 18-36); a database server for storing user information (col. 14, lines 24-30); a transaction server for processing of requests communicated to said server system by said client system (col. 14, lines); a cryptographic device for encrypting communication between said client system and said server system (col. 6, lines 20-23, i. e., "decrypting the received data packet" implies that the second processor-based system must have a cryptographic device); a communication link with a financial management system for processing user payments (col. 13, lines 45-50, i.e., "the provider will demand payment from the bank card company concurrent with the postage demand.").

As to independent claim 63 and dependent claim 64-67, Kara does not explicitly disclose either a firewall for ensuring the integrity of the server system against potential unauthorized access or a communication link with the United States Postal Service Central Meter Licensing System (USPS CMLS) for licensing

a user. However, as shown by IBIPSS (see page 3 - 13, section 3.2.6.3), the open system server shall prompt the user to apply for a postage meter license and update the license as required by the DMM. Thus it would have been obvious to one of ordinary skill in the art to establish a communication link with the USPS CMLS for licensing of a user to satisfy the requirement. Further Kara states that the server system can be used by a plurality of remotely located client systems and the client system provides security system to prevent authorization utilization of the postage metering system (col. 4, lines 36-51). Of course, a firewall is one of the well-known security systems in the art and the use of this well known feature at the server system would have been within the level of ordinary skill in the art, since it has been held that rearranging parts of an invention involves only routine skill in the art.

In regards to claim 64, IBIPSS disclose the use of a system software down-loadable from said server system to said client system (see page 3-3, section 3.2.1.1) to ensure the proper installation and configuration of the user system. Thus, it would have been obvious to one of ordinary skill in the art to modify the system of Kara by adopting the teaching of IBIPSS to ensure the proper installation and configuration of the client system.

In regards to claim 65, Kara discloses that said server system is accessible through an Internet portal (col. 7, lines 25-27).

In regard to claim 66, Kara discloses that said client system interfaces with at least one user (col. 1, lines 22-29).

In regard to claim 67, Kara discloses that said client system comprises administration software (*i.e. data communications program*) to monitor (*i.e., to maintaining a link, the data communication program has to monitor the system*) at least one client system.

Applicant respectfully disagrees and submits that independent claim 63 is allowable for at least the following reasons.

Kara does not teach, suggest, or describe a continuous communication link with the United States Postal Service Central Meter Licensing System for licensing of a user.

Applicant agrees that Kara does not explicitly teach the utilization of a firewall for ensuring the integrity of the server system against potential unauthorized access or a communication link with the United States Postal Service Central Meter Licensing System ("USPS CMLS") for licensing a user.

However, Applicant disagrees with the Examiner's notion that it would have been obvious to one of ordinary skill in the art to establish a communication link with the USPS CMLS for licensing a user. As support for the contention that a communication link between the server system and the USPS CMLS occurs, the Examiner relies on Kara in view of IBIPSS. The Examiner states "the open server system server shall prompt the user to apply for a postage meter license and update the license as required by DMM. Thus, it would have been obvious to one of ordinary skill in the art to establish a communication link with the United States Postal Service Central Meter Licensing System (USPS CMLS) for licensing of a user to satisfy the requirement." Applicant respectfully disagrees with the Examiner's statement that such a step would have been obvious because neither Kara or IBIPSS teach, suggest or describe the establishment of a continuous communication link between the server system with the USPS CMLS.

The Examiner points to page 3-13 section 3.2.6.3 of the IBIPSS in support of the notion that the open server shall prompt the user to apply for a postage meter license and to update the license as required by DMM. However the portion cited does not describe a United States Postal Service Central Meter Licensing System that is in continuous communication with the server system. Moreover as stated in Kara, after transmittal of the data packet to the client system the communication link is terminated. (col. 15, lines 4-7)

Applicant respectfully submits that the Examiner has utilized impermissible hindsight in drawing the conclusion that it would have been

obvious of one of ordinary skill to establish a continuous communication link with the United States Postal Central Meter Licensing System (USPS CMLS). The specification filed in support of the claimed invention discusses the benefits of a continuous link with the USPS at page 98, lines 3-6. The application states that user software allows the user to apply for a new meter license, update an existing meter license, check the meter license status and print the meter license status. Without a continuous link present such features would be unavailable. Moreover at page 99, lines 22-24, the continuous link allows for server systems to effectuate a method of payment to the USPS CMLS once a user purchases postage. Neither Kara in view of IBIPSS, nor any of the other prior art of record suggests such a technique. Since none of the references (other than the specification filed in support of the claimed invention) discuss the benefits of continuous link with the USPS CMLS, Applicant respectfully submits that the Examiner has utilized impermissible hindsight in drawing the conclusion that a continuous link with the USPS CMLS is obvious to one of ordinary skill in the art.

D. Dependent Claims 64-67

Applicant respectfully submits that claims 64-67 being dependent upon respectable allowable base claims are allowable for at least the aforementioned reasons.

CONCLUSION

For at least the above aforementioned reasons, Applicant respectfully submits that pending claims 1, 3-4, 6, 7, 10, 12-14, 18-21, 23-25, 27-29, 31-34, 36, 39, and 41-81 are patentably distinct from the prior art of record and in condition for allowance. Applicant therefore respectfully requests that pending claims 1, 3-4, 6, 7, 10, 12-14, 18-21, 23-25, 27-29, 31-34, 36, 39, and 41-81 be placed in condition for allowance.

Very truly yours,

THE HECKER LAW GROUP

Date: July 20, 2001

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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Assistant Commissioner of Patents, Washington, D.C. 20231, on July 20, 2001:

D. Blizzard 7/20/01
Signature: Denna Blizzard Date



Serial No.: 09/163,993

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

IN THE CLAIMS

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1. (TWICE AMENDED) A secure on-line printing method,
comprising:
establishing a communication link between a first computer and a second
computer;
executing a client software on said first computer, wherein said client
software initiates a secure continuous communication link between said first
computer and said second computer;
monitoring said secure continuous communication link between said first
computer and said second computer;
terminating said client software when said secure communication link is
not continuous;
sending a request for value bearing information from said client software
to said second computer; and
sending said value-bearing information from said second computer to
said first computer in response to said request, while said secure communication
link is continuous; *improper*
printing said value-bearing information while said secure continuous
communication link persists; *improper*

2. (PLEASE CANCEL WITHOUT PREJUDICE)

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

3. (ONCE AMENDED) The method of claim 1 [2] wherein said request comprises encrypted data.
4. (UNCHANGED) The method of claim 3 wherein said value-bearing item information comprises encrypted data.
5. (CANCELED)
6. (UNCHANGED) The method of claim 3 wherein said value-bearing information comprises an image of a postal indicium.
7. (UNCHANGED) The method of claim 6 wherein said request comprises a postage amount
8. (CANCELED)
9. (CANCELED)
10. (TWICE AMENDED) The method of claim 1 wherein said sending said request for said value bearing information is in response to command from a user.
11. (CANCELED)

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

12. (UNCHANGED) The method of claim 7 wherein said second computer comprises a database containing user information.
13. (UNCHANGED) The method of claim 12 wherein said user information comprises financial information associated with said user.
14. (UNCHANGED) The method of claim 13 wherein said sending [a] said request to said second computer further comprises accessing said user information to verify fund availability to cover said postage amount.
15. (CANCELED)
16. (CANCELED)
17. (CANCELED)
18. (TWICE AMENDED) The method of claim 14 wherein said value-bearing information comprises disabling [the] a print spooler of a printer connected to said first computer.

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

19. (UNCHANGED) The method of claim 18 further comprising said client software sending a print command to said printer when said communication link disconnects:

20. (UNCHANGED) The method of claim 1 wherein said value-bearing information comprise ticket information

21. (UNCHANGED) The method of claim 20 wherein said request comprises a ticket price.

22. (CANCELED)

23. (ONCE AMENDED) The method of claim 1 wherein said second computer sends [a permission] authorization to said first computer in response to said request, said second computer accessing [a] said user's financial information to verify funds availability.

24. (UNCHANGED) The method of claim 1 wherein said value-bearing information comprise check information.

25. (UNCHANGED) The method of claim 24 wherein said request comprises a check amount.

26. (CANCELED)

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

27. (TWICE AMENDED) The method of claim 1 further comprising:
accessing [a] said user's financial information to verify funds availability
to cover said value-bearing information;
sending [a permission] said authorization to said first computer.

28. (UNCHANGED) The method of claim 1 wherein said value-bearing information comprises coupon information.

29. (UNCHANGED) The method of claim 28 wherein said request comprises a coupon amount.

30. (CANCELED)

31. (UNCHANGED) The method of claim 1 wherein said information comprises certificate information.

32. (ONCE AMENDED) A secure on-line postage metering method comprising:
establishing a secure communication link between a user computer and a vendor computer;
providing a printer connected to said user computer;
executing an on-line postage metering software on said user computer wherein said on-line postage metering software determines if said secure

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

communication link between said first computer and said second computer is continuous;

terminating said on-line postage metering software when said communication link is not continuous;

said on-line metering software sending a request for a print authorization to said vendor computer;

said vendor computer accessing a database to verify fund availability to cover said request;

said vendor computer sending data elements for a postage indicium to said first computer as a response to said request;

said on-line postage metering software sending a postage indicium graphic associated with said data elements to said printer while said secure continuous communication link persists.

Improper

33. (UNCHANGED) The method of claim 32 wherein said on-line postage metering software sending said request comprises encrypting said request.

34. (UNCHANGED) The method of claim 32 wherein said vendor computer sending said response further comprises encrypting said response.

35. (CANCELED)

36. (UNCHANGED) The method of claim 32 further comprising:

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

said on-line metering software disabling a print spooler of said printer.

37. (CANCELED)

38. (CANCELED)

39. (UNCHANGED) The method of claim 32 wherein said on-line postage metering software sending said request for said print authorization is in response to a command from a user.

40. (CANCELED)

41. (ONCE AMENDED) The method of claim 32 further comprising said on-line postage metering software sending a print cancel command to said printer if said secure communication link is interrupted.

42. (TWICE AMENDED) A secure on-line postage management system method comprising:
establishing a secure continuous communication link between a client system and server system;
said client system processing a user request for obtaining an indicium;
said client system securely communicating said user request to said server system;

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

said server system processing said user request;
said server system securely communicating to said client system a
response to said user request;
said client system processing said response to obtain said indicium;
said client system obtaining indicium while said secure continuous
communication link persists; *improper*
said client system printing said indicium while said secure continuous
communication link persists; *improper*

43. (ONCE AMENDED) The method of claim 42 wherein said client
system securely communicating with said server system comprises:

authenticating a user by a establishing [a] said secure[d] communication
link between said client system and said server system and verifying the
authenticity of information exchanged;

continuously monitoring said secure[d] communication link to verify said
authenticity of information exchanged.

Twice amended
44. (UNCHANGED) The method of claim 43 wherein said
authenticating [a] said user comprises:

said client system obtaining a password;
securely sending said password to said server system;
said client system issuing a challenge to said server system;
said server system modifying said challenge cryptographically;

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

said client system verifying said modified challenge for proper authentication of the communication.

45. (UNCHANGED) The method of claim 44 wherein said sending said password comprises sending said password to said server using triple Data Encryption Standard (DES) of the *Internet (Improper)* protocol, thereby establishing an SSL triple DES communication session between said client system and said server system.

46. (UNCHANGED) The method of claim 45 wherein said client system issuing a challenge comprises issuing a 64 bit random number to said server system.

47. (UNCHANGED) The method of claim 46 wherein said server modifying said challenge comprises said server system digitally signing said challenge using a cryptographic module and a private key associated with said server system.

48. (UNCHANGED) The method of claim 47 wherein said client system verifying said modified challenge comprises using a public key corresponding to said private key associated with said server system to verify said digital signature of said challenge.

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

49. (ONCE AMENDED) The method of claim 43 wherein said continuously monitoring said secure communication link comprises:

- said server system retrieving a password associated with said client system;
- generating a message authentication code using said password associated with said client system;
- sending said message authentication code and [a] said challenge to said client system;
- said client system verifying said authentication code using said challenge and said password associated with said client system.

50. (UNCHANGED) The method of claim 49 wherein said retrieving said password further comprises:

- retrieving said password from a database;
- decrypting said password if said password is encrypted.

51. (UNCHANGED) The method of claim 50 wherein said message authentication code is generated using [a] said password associated with said client system.

52. (UNCHANGED) The method of claim 42 wherein said secure continuous communication link between said client system and said server system is established through a firewall.

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

53. (ONCE AMENDED) The method of claim 42 wherein said secure continuous [and secure] communication between said client system and said server system is established via the Internet secure sockets layer (SSL) protocol.

54. (UNCHANGED) The method of claim 42 wherein said server system processing said user request takes place in a public network and a private network included within said server system.

55. (ONCE AMENDED) The method of claim 54 wherein said public network processes said user requests independently from said private network to protect the integrity of said server system.

56. (ONCE AMENDED) The method of claim 42 wherein said secure communication between said client system and said server system is encrypted.

57. (ONCE AMENDED) The method of claim 42 wherein said secure communication between client system and server system is encrypted by a United States Postal Service compliant cryptographic device.

58. (ONCE AMENDED) The method of claim 42 further comprising [the step of] disabling said client system from obtaining said indicium if said secure [and] continuous communication between client system and server system is discontinued.

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

59. (ONCE AMENDED) The method of claim 54 wherein said private network processes said user requests for making payments.

60. (ONCE AMENDED) The method of claim 59 wherein said private network processes said users requests for making payments further comprises communicating with a financial management system for verification of availability of funds and fund transfer.

61. (UNCHANGED) The method of claim 42 further comprising said server system communicating with the United States Postal Central Meter Licensing System (USPS CMLS) for processing of user licensing information.

62. (ONCE AMENDED) The method of claim 61 further comprising registering a said user.

63. (TWICE AMENDED) An on-line postage system for processing of user requests and obtaining postage indicia comprising:

a client system for interfacing with a user;

a server system in continuous and secure communication with said client system, comprising:

a communication server for communicating with the client system;

a database server for storing user information;

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

a transaction server for processing of requests communicated to said server system by said client system;

a firewall for ensuring the integrity of said server system against potential unauthorized access;

a cryptographic device for encrypting communication between said client system and said server system;

a continuous communication link with the United States Postal Service Central Meter Licensing System (USPS CMLS) for licensing a user;

a continuous communication link with a financial management system for processing user payments.

64. (UNCHANGED) The on-line postage system of claim 63 further comprising a system software down-loadable from said server system to said client system.

65. (UNCHANGED) The on-line postage system of claim 63 wherein said client system interfaces with at least one user.

66. (UNCHANGED) The on-line postage system of claim 63 wherein said server system is accessible through an Internet portal.

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

67. (ONCE AMENDED) The on-line postage system of claim 63 wherein said client system comprises administration software to monitor [at least one] said client system.

68. (ONCE AMENDED) The method of claim 42 wherein said client system obtaining said indicium comprises:

maintaining a said continuous communication link between said client system and said server system; and

retrieving said indicium from said server system.

69. (ONCE AMENDED) A method comprising:

establishing a secure continuous communication link between a client system and a server system, wherein said client system comprises client system software;

said client system software, presenting one or more options for submitting at least one payment;

submitting said at least one payment to said server system software while said secure continuous communication link persists;

adding postage value corresponding to an amount of said at least one payment to user account;

printing at least one indicia representative of said postage value while said secure continuous communication link persists.

improper

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

70. (UNCHANGED) The method of claim 69 further comprising:
deducting said amount from said user account.

71. (UNCHANGED) The method of claim 70 wherein said deducting is
performed upon authorization from said user.

72. (ONCE AMENDED) The method of claim 69 wherein at least one
payment comprises credit card data.

73. (ONCE AMENDED) The method of claim 69 wherein at least one
payment comprises electronic funds transfer data.

74. (ONCE AMENDED) A computer program product comprising:
a computer readable medium having [computer readable program code]
client system software embodied therein, said [computer readable program code]
client system software configured to:

establish a secure continuous communication link between a client system
and a server system comprising server system software, wherein said client
system comprises client system software configured to present one or more
options for submitting at least one payment;

said client system configured to submit said at least one payment to said
server system software while said secure continuous communication link persist
between said client system and said server system;

said server system software configure to credit postage value
corresponding to an amount of said at least one payment to a user account;

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

said client system software printing at least one indicia representative of said postage value while said secure continuous communication link to said server system software persists.

75. (ONCE AMENDED) The computer program product of claim 74 further comprising [computer readable program code] said client system software configured to deduct said amount from said user account.

76. (ONCE AMENDED) The computer program product of claim 74 wherein said [deducting] submitting is performed by said [computer readable program code] client system software upon authorization from said user.

77. (UNCHANGED) The computer program product of claim 74 wherein said payment comprises credit card data.

78. (UNCHANGED) The computer program product of claim 74 wherein said payment comprises electronic funds transfer data.

79. (ONCE AMENDED) The computer program product of claim 74 wherein said secure continuous communication link utilizes Internet protocols to transfer data.

MARKED-UP VERSION OF CLAIMS IN ACCORDANCE WITH 37 CFR 1.121(c)(1)(ii)

80. (ONCE AMENDED) The computer program product of claim 74 wherein said client system software prohibits transmission if said secure continuous communication link fails authentication.

81. (UNCHANGED) The computer program product of claim 74 wherein data transmitted between said client software and said server system software comprises encrypted information.